

**QBE Insurance Group**

# **Group Whistleblowing Policy**



Effective date: 1 January 2020

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# 1. Introduction

## Why do we need a Whistleblowing Policy?

QBE aims to maintain high ethical standards where all employees are respectful, professional and considerate and act with honesty and integrity. QBE employees play a key role in ensuring that dishonesty, corruption or other illegal or inappropriate behaviours, conduct or activities are reported so they can be dealt with appropriately.

**It is QBE's responsibility to create an open, safe and transparent environment where employees who report misconduct or other illegal or inappropriate behaviours are supported and are not subject to any Detrimental Treatment<sup>1</sup>.**

This Policy outlines QBE's minimum standards in encouraging and supporting employees, contractors, and directors in reporting misconduct and other illegal or inappropriate behaviours.

It reflects QBE's commitment to:

- high standards of openness, honesty and accountability;
- the seriousness with which QBE treats reported matters;
- ensuring confidentiality; and,
- ensuring people do not suffer any Detrimental Treatment as a result of reporting their concerns.

## Who does this Policy apply to?

All QBE employees, contractors, contingent workers and directors are subject to the Group Whistleblowing Policy. Wherever the word 'employee' appears in this Policy, it should be read as including contractors, contingent workers and directors.

**Employees, officers (directors) and suppliers of any of QBE's Australian entities should also refer to *Appendix A - Whistleblowing Laws Australian entities* to assess if their report may entitle them to additional protections under Australian Whistleblower Protection Laws. In summary, to qualify for the additional protections, a report must be made by an Eligible Whistleblower to an Eligible Recipient about a Disclosable Matter. Further details, including definitions of these terms, are set out at Appendix A.**

<sup>1</sup> *Detrimental Treatment is a defined term. Refer to 4. Definitions and Acronyms.*



## What is “whistleblowing”?

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Whistleblowing is when an employee reports or discloses information about conduct or activity where they have a genuine concern, or reasonable belief, that activity or conduct may be or is:

- a breach of QBE policies, including the Code of Ethics and Conduct; or
- unethical or illegal misconduct, or,
- represents a danger in the workplace, or,
- a breach of QBE’s accounting, internal control, compliance and/or audit processes.

## Examples of reportable conduct and activities

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The following are examples of the types of conduct or activities employees are encouraged and expected to report where they have a genuine concern and reasonable belief that the conduct or activity has happened or may happen.

- Actual or potential breaches of QBE Policies and the Code of Ethics and Conduct (e.g. breach of applicable laws or regulations, or dishonest, fraudulent and corrupt conduct);
- Illegal acts (e.g. criminal activity, theft or bribery, drug sale/use, violence or threatened violence and property damage);
- General misconduct (e.g. unauthorised or inappropriate use or disclosure of confidential information or customer records or activities that contribute to an unsafe work environment, such as bullying or harassment);
- Conduct or activities that may cause financial or non-financial loss or may otherwise be detrimental to the interests, financial position, or reputation of QBE (e.g. impeding internal or external audit processes); and
- Any improper behaviour in relation to accounting, internal controls, actuarial, compliance, audit or other matters (e.g. substantial mismanagement of QBE’s resources, irregularities in financial accounts).

## 2. Approach

This section sets out the key principles and requirements that govern QBE's approach to Whistleblowing.

### 2.1 What are the principles of this Policy?

QBE has this Group Whistleblowing Policy and, where appropriate, divisional Whistleblowing Policies to provide employees with information about how to report concerns and to whom those concerns should be reported.

Requirements listed in this Group Whistleblowing Policy at clause 2.2 are to be read in the context of these principles.

- a) Employees who hold genuine concerns about conduct or activities are expected to report those concerns promptly and without delay. Deliberate or wilful failure to report or to refer genuine concerns may result in disciplinary action. Employees are encouraged to report their concerns to their manager or a senior manager, or to HR or Compliance teams. Subject to local regulatory requirements, reports can be made anonymously via the QBE Ethics Hotline;
- b) A number of avenues are available for employees to report conduct or activities within QBE. For instance, employees can report concerns internally to people such as their manager, a senior manager, or their Human Resources (HR) or Compliance teams. Depending on the issue, employees can choose to report to employees working in other teams such as (but not limited to) Legal, Fraud / Financial Crime Management teams (if they exist separately in a division), Risk or Procurement.<sup>2 3</sup>
- c) QBE provides an independent and confidential service ("The QBE Ethics Hotline") as an alternative for any employee who feels unable to report conduct or activities to their manager, a senior manager or to HR or Compliance teams or who has already reported via these channels and does not feel their concerns have been properly or appropriately addressed or investigated and remediated. Managers are expected to encourage and create an open, transparent and safe working environment, ensure their teams are aware of this Group Whistleblowing and/or divisional Whistleblowing Policies, and treat any reports made by employees seriously and in accordance with the Principles of this Policy.

<sup>2</sup> Detailed information on how to report conduct or activities is included in Group and/or Division Whistleblowing Guidelines.

<sup>3</sup> Depending on the division, there may other teams that it may be appropriate for an employee to report matters to, such as in ANZO, the Protective Services team.



- d) Depending on the nature and type of the report, some reports made directly to managers or employees should be logged in the QBE Ethics Hotline using the Manager Incident Reporting Form.<sup>4</sup> If you are unsure whether a report should be logged in your existing risk management or issues and incident system or in the QBE Ethics Hotline, contact your Compliance team for guidance.
- e) QBE will not tolerate any Detrimental Treatment against an employee as a result of an employee reporting any concerns. If Detrimental Treatment against an employee is proven, disciplinary action, including possible termination of employment by any employee or people leader engaged in, or facilitating, the Detrimental Treatment may occur;
- f) Any reports made by employees will be kept confidential to the extent possible. The identity of any employee making a report will be protected and not communicated to the person/s accused of wrongdoing without the consent of the employee or unless required by law. Some disclosure of Whistleblowing reports will be made, as set out in the Guidelines, to enable investigation of the matter to report appropriately on the outcomes of the investigation and for suitable action to be recommended;
- g) Reports will be acknowledged and recorded, investigated fully and fairly, and resolved on a timely basis. Where possible, all parties involved in the report (the person making the complaint and the person(s) accused) will be informed of the progress of the investigation;
- h) Employees who feel unable to make a report to their manager, a senior manager or to their HR or Compliance teams (or other specialist teams, depending on the issue) or via the QBE Ethics Hotline may be able to make the disclosure to an external party (including regulators or other Government agencies or external auditors as appropriate)<sup>5</sup>; and,
- i) Depending on jurisdiction, additional legal protections for employees may also apply in certain circumstances. Further information is available in either the Group and/or divisional Guidelines.

*4 Detailed information on how managers log reports directly into the QBE Ethics Hotline can be found on QUBE.*

*5 Where available, information on external reporting options are included in Group and/or Divisional Whistleblowing Guidelines.*

## 2.2 What are the requirements of this Policy?

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In order to comply with this Policy, the following are required to be in place to support the operation of the Policy.

- a) Within three months of the effective date of this Policy, adoption of this Group Whistleblowing Policy or a divisional Whistleblowing Policy that reflects these group minimum standards;
- b) Where a divisional Whistleblowing Policy is adopted, a gap analysis, completed within six months of the effective date of this Group Whistleblowing Policy, noting any differences, including those required due to local regulatory requirements, between the Group and divisional Whistleblowing Policies;
- c) Where appropriate, closure of material gaps between the Group Whistleblowing Policy and divisional Whistleblowing Policies within twelve months from the effective date of this Group Whistleblowing Policy - noting it may not be possible to close some gaps due to local regulatory requirements;
- d) Group and divisional whistleblowing programs, reflecting the requirements of the Group or divisional Whistleblowing Policies;
- e) Reporting to the Group Compliance team on the outcomes of whistleblowing investigations (de-identified as required) for the purposes of Group Board/Committee reporting.

## 2.3 What are the consequences of non-compliance?

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A deliberate or wilful failure to report or refer concerns may result in significant regulatory enforcement action, fines, serious reputation damage and criminal charges in Australia or elsewhere.

QBE will not tolerate any employee being subjected to any Detrimental Treatment as a result of reporting any concerns. If Detrimental Treatment against an employee is proven, disciplinary action, including possible termination of employment may occur. In some jurisdictions, Detrimental Treatment can result in personal civil liability.

## 3. Responsibilities

This section sets out the responsibilities and requirements under this Group Whistleblowing Policy.

### Board Audit Committee

The Group Board Audit Committee is responsible for review and, if thought appropriate, approval of this Policy.

The Committee will also receive reports from the Head of Group Internal Audit and have oversight of reported matters and investigation outcomes.

### CEOs and managers

CEOs and managers are responsible for:

- encouraging and creating an open, transparent and safe working environment;
- ensuring their employees are aware of the appropriate Group or divisional Whistleblowing Policies, and Guidelines and the different avenues open to employees to disclose Whistleblowing matters safely;
- supporting and actively promoting the reporting of all actual or suspected cases of inappropriate conduct and activities;
- providing the necessary support for employees who make valid reports based on genuine grounds, whether they are subsequently proven true or not, and
- if an employee reports a matter directly to them, logging that report into the QBE Ethics Hotline.

### Nominated Investigators

Nominated Investigator(s) are:

- nominated to investigate Whistleblowing matters depending on the type and nature of the report received;
- responsible for the conduct and completion of Whistleblowing investigations, including ensuring that the investigation is conducted in accordance with the Principles set out in this Policy and/or divisional Whistleblowing Policies and with any requirements in Group and/or Divisional Guidelines; and
- The Nominated Investigator can elect other employees to assist with investigations.





## Group/Divisional Human Resources teams

Group/divisional Human Resources Departments are responsible for:

- providing advice on any Whistleblowing reports with a human resources element;
- acting as or assisting the Nominated Investigator as required; and
- ensuring that any disciplinary actions recommended because of a Whistleblowing investigation are compliant with all human resources legislative and regulatory requirements.

## Group Internal Audit

Group Internal Audit:

- will be notified of Whistleblowing reports (as appropriate) made in accordance with Group and/or divisional Whistleblowing Policies in a timely manner and, in any event, before investigation commences;
- will receive and review all investigation reports and may require further investigations to be undertaken or determine that alternate actions are required before the investigation is deemed final or closed;
- will report Whistleblowing matters through established Internal Audit reporting mechanisms; and
- twice a year, or more frequently if required, the Head of Group Internal Audit will provide a summary of all reports made across Group Head Office and all Divisions and the way in which they were addressed to the Group BAC (and Divisional BACs as appropriate).

## Compliance teams (or delegates)<sup>6</sup>

Group/divisional compliance teams (or delegates) are responsible for:

- providing advice on whistleblowing reports;
- acting as or assisting the Nominated Investigator as required.
- ensuring the requirements of this Policy (set out in clause 2.2) are in place; and
- where required, reporting on Whistleblowing matters to the appropriate regulatory authority, with notification to Group Compliance, and to Group and/or divisional boards.

## Employees, contractors and directors

All employees, contractors, and directors are responsible for understanding and complying with either the Group Whistleblowing Policy or divisional policies and procedures.

Employees are also responsible for:

- attending and participating in relevant training sessions and/or receiving and taking proactive steps to understand received communications; and
- reporting and/or referring Whistleblowing matters using available avenues including the QBE Ethics Hotline.

<sup>6</sup> Depending on the division, other teams are responsible for whistleblowing matters, for e.g. in AUSPAC the Financial Crime team is accountable.

## 4. Definitions and acronyms

For the purpose of this Policy and the Appendix, the following definitions and acronyms apply.

<b>Australian Whistleblower Protection Laws</b>	Refers to the whistleblowing amendments made to the Australian Corporations Act 2001 (Cth) and the Taxation Administration Act 1953 (Cth) and effective 1 January 2020.
<b>BAC</b>	Board Audit Committee.
<b>Compliance and/or Financial Crime Management Teams</b>	The department, function or individual responsible for managing compliance with applicable Whistleblowing obligations.
<b>Controlled Entity</b>	<p>As defined in Australian Accounting Standard AASB 10. Each controlled entity is deemed to be part of a Division.</p> <p>Controlled entities include all QBE insurance and (re)insurance companies, agencies and service companies.</p> <p><i>Note: a Controlled Entity / entity may be defined differently or broader depending on division.</i></p>
<b>Detrimental treatment</b>	Includes dismissal, demotion, disciplinary action, discrimination, harassment, intimidation, reprisals, disadvantage, retaliation, threats or other unfavourable treatment against an employee connected with raising a reportable concern.
<b>Division</b>	<p>One of QBE Group's operating divisions, including:</p> <ul style="list-style-type: none"><li>• <i>AUSPAC (Australian and Pacific Islands)</i></li><li>• <i>International - European Operations (EO) and Asia</i></li><li>• <i>North American Operations (NA);</i></li><li>• <i>Equator Reinsurances Limited and any other reinsurance entities; and</i></li><li>• <i>Group Head Office (GHO) including the Group Shared Services Centre (GSSC).</i></li></ul> <p>References to a Division also apply to countries forming part of that Division.</p>
<b>Group Internal Audit</b>	<p>Group Internal Audit is a global team comprising Internal Audit employees across divisions.</p> <p>A reference to Group Internal Audit is to be read as referring to the Group Internal Audit employee with internal audit responsibility for Group Head Office and/or a division.</p>
<b>Tier Administrator/s</b>	Individuals with access to the Hotline and tasked with responsibility for oversight and management of the Hotline.
<b>QBE</b>	QBE Insurance Group Limited and its Controlled Entities.

## Appendix A:

# Whistleblowing laws - Australian entities

## A. Overview

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### Purpose

The purpose of this Appendix is to ensure QBE's Australian entities comply with the Australian Whistleblower Protection Laws.

The Whistleblower Protection Laws aim to:

- encourage and protect Eligible Whistleblowers from victimisation;
- maintain their confidentiality;
- prevent fraud and corporate wrongdoing; and
- strengthen corporate compliance.

This Appendix applies (and a report will be defined as a Protected Disclosure) when:

1. the whistleblower is an Eligible Whistleblower; and,
2. their disclosure is made to a prescribed body or an Eligible Recipient; and,
3. their disclosure relates to a Disclosable Matter.

If the report is not defined as a Protected Disclosure, it may still be defined as a whistleblowing report and the principles of the Policy may still apply.

### **Who is an 'Eligible Whistleblower'?**

An Eligible Whistleblower is a person who is a current or former officer, employee, secondee or volunteer, an individual that has provided goods or services, an agent, an associate or a dependant or relative of any of these individuals of any Australian entity ('Australian whistleblowers').

*Note: An Eligible Whistleblower can be employed by an Australian entity but not actually be located in Australia.*

## Who are 'Eligible Recipients'?

Disclosures must be made to 'Eligible Recipients' or prescribed bodies. A prescribed body may be the Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA).

Eligible Recipients do not need to be employed or associated with the Australian entity and can be any of the following individuals of any of QBE's companies, including any of our related companies or any divisions:

- any officer/director or senior manager;
- any auditor, or member of an audit team conducting an audit;
- any actuary;
- any of QBE's tax agents;
- any other authorised person. For the purpose of this Appendix, individuals authorised by QBE to receive a Disclosable Matter are any employees of Compliance, Risk, Legal, Financial Crime Management, or Human Resources team.

## What is a 'Disclosable Matter'?

Disclosable Matters fall into three types.

1. The information being disclosed concerns 'misconduct' and/or an 'improper state of affairs or circumstances.' These terms are broadly defined but can include failure to comply with a legal duty, gross mismanagement or waste, dishonest or unethical behaviour, fraud or other type of criminal behaviour, negligence, breach of trust, or breach of duty; and/or
2. The information being disclosed indicates that QBE (any of its companies, officers or employees) have engaged in conduct that would:
  - be an offence under Australian banking and / or financial legislation and regulation (typically any legislation or regulation regulated by ASIC or APRA);
  - constitute an offence against any other law of the Commonwealth where prison for a period of 12 months or more is the punishment; and
  - represent a danger to the public or the Australian financial system.
3. The information being disclosed relates to misconduct and improper conduct in relation to tax affairs.

## Appendix availability

- This information is contained in QBE's Group Whistleblowing Policy which is available on the Global Policies and Procedures page on QUBE; and
- It is available on request from QBE, in hard copy; and
- It is accessible on QBE's public website, [www.qbe.com](http://www.qbe.com) – to ensure suppliers and other third parties are informed about making reports.

## Personal work-related grievances

Unless an exception applies, a personal work-related grievance is not a Disclosable Matter.

Examples of personal work-related grievances include:

- inter-personal conflicts within the workplace;
- decisions relating to engagement, promotion, suspension, demotion or termination of employment of the discloser;
- decisions relating to terms and conditions of employment of the discloser.

A personal work-related grievance that is not a Disclosable Matter should be reported using local processes.

Some personal work-related grievances can involve very serious wrongdoing and will entitle the discloser to protection. This includes grievances that:

- concern a detriment to the discloser caused by alleged victimisation;
- have been made to a legal practitioner to obtain legal advice; or
- have significant implications for QBE and concern alleged conduct that could be an offence or contravention as set out in this policy.

## Public interest and emergency disclosures

Public Interest Disclosures can be made to a journalist or a member of an Australian Parliament in certain, limited cases (excluding tax matters), if the following conditions are met:

- the disclosure has been previously made to a regulatory body; and
- at least 90 days has passed since the first disclosure was made; and
- there are reasonable grounds to believe that action is not being or has not been taken to address the disclosed matter; and
- written notification has been provided to the regulatory body to which the previous disclosure was made, explaining that there is an intent to make a Public Interest Disclosure (or Emergency Disclosure).

To make an Emergency Disclosure, in addition to the above, there must be reasonable grounds to believe that the information to be disclosed concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment.

QBE encourages any potential discloser to obtain their own legal advice before reporting any concern to a journalist or a member of an Australian Parliament.

## Anonymous disclosures

Protected Disclosures can be made anonymously. However, to enable us to properly investigate and respond to disclosures, QBE encourages disclosers to provide their name.

The QBE Ethics Hotline ('Hotline') is provided specifically for this purpose. It is an independent and confidential whistleblowing service that can be used by those who feel unable to report conduct or concerns to Eligible Recipients.

Reports can also be made to Eligible Recipients either anonymously or by an Eligible Whistleblower identifying themselves to the Eligible Recipient and then requesting anonymity from them.

Where the Eligible Whistleblower has identified themselves but requested anonymity, the Eligible Recipient must ensure the identity of the Eligible Whistleblower is protected and not disclosed.

## Confidentiality

QBE will keep a discloser's identity (or information likely to lead to their identity) confidential, except in the following circumstances:

- the discloser consents, in writing, to this information being disclosed; or
- during the investigation process, QBE is permitted to disclose information (other than the identity of the discloser) that is reasonably necessary for the purposes of investigating the disclosure. In such a case QBE will take reasonable steps to reduce the risk of the discloser being identified; or
- QBE needs to disclose this information to obtain confidential legal advice or representation; or
- QBE is required or permitted to do so by law; or
- we need to disclose the information to prevent a serious and imminent threat to life, health or property.

**If any person receives information about the identity of a discloser** (whether indirectly or directly), **they must keep that information confidential** (except in the circumstances permitted above).

## Eligible Whistleblower's rights

Eligible Whistleblowers will be protected from **Victimisation** and/or **Detrimental Treatment**.

QBE does not tolerate detrimental treatment of an Eligible Whistleblower and is committed to protecting persons from being victimised in the workplace as a result of an actual or potential disclosure.

## What is victimisation?

Victimisation is conduct that causes any detriment to another person (or, conduct that constitutes making a threat to cause detriment to another person) where the reason (or part of the reason) for the conduct is a belief or suspicion that the other person (or any other person) made, may have made, proposes to make, or could make a disclosure of improper conduct.

Examples of **Detrimental Treatment** include, but are not limited to:

- dismissal or demotion of an employee;
- injury of an employee in their employment;
- changing an employee's position or duties to their disadvantage;
- discrimination between an employee and other employees of QBE;
- harassment or intimidation of a person;
- harm or injury to a person, including psychological harm;
- damage to a person's property;
- damage to a person's reputation;
- damage to a person's business or financial position; or any other damage to a person.

## Protections available at law, compensation and independent legal advice

Where a Protected Disclosure is made, the Whistleblower Protection Laws provide that:

- the discloser cannot be subject to any civil, criminal or administrative liability, for making a protected disclosure;
- no contractual or other remedy may be enforced, and no contractual right may be exercised against the discloser based on the Protected Disclosure;
- the discloser may be subject to civil, criminal or administrative liability for conduct that is revealed by the Protected Disclosure;
- if the Protected Disclosure is to a regulator, or is a public interest or emergency disclosure as permitted under the law, the information is not admissible in evidence against the discloser in criminal proceedings, or in proceedings for the imposition of a penalty (except for proceedings in respect of providing false information).

An Eligible Whistleblower is entitled to seek compensation through the courts if:

- they suffer a loss; and/or
- QBE fails to prevent a person from causing detriment to them.

In these events, it is recommended that an Eligible Whistleblower should seek independent and external legal advice.

## B. Report management

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### Investigation

QBE will investigate all reports that it determines to be Protected Disclosures.

Where possible and appropriate, all parties involved in the Protected Disclosure will be regularly informed of the progress of any investigation and appraised of the outcome.

*Note: Where the disclosure has been made on an anonymous basis, it may be more difficult for QBE to keep the discloser updated.*

Investigations will be conducted by skilled individuals who hold roles in QBE with responsibility for managing whistleblowing reports. These individuals will be overseen by others who hold roles with responsibility for protecting or safeguarding Eligible Whistleblowers and for ensuring the integrity of QBE's whistleblowing program.

On occasions, specialised individuals may be required to assist with an investigation, for example: Human Resources, Tax, Financial Crime Management, Compliance and/ or Legal. Group Internal Audit may also be required to assist on request in complex and confidential matters. Depending on the nature of the report, its complexity and / or sensitivity, external investigation firms and financial advisers may be engaged to assist.

### Assessment

The following process must be followed when a report is made directly to an Eligible Recipient:

- the Eligible Recipient must explain to the discloser that they will log the report into the Hotline on their behalf and encourage the discloser to use the Hotline going forward;
- the Eligible Recipient must provide the discloser with the unique reference number generated by the Hotline.

For all disclosures, regardless of how they are made (to an Eligible Recipient or via the Hotline), the relevant Group or AUSPAC Tier Administrator will assess the report within three business days. This includes assessing whether the report:

- has been made by an Eligible Whistleblower; and
- has been made to an Eligible Recipient; and
- is a Disclosable Matter.

Consideration should also be given to whether the report is a personal work-related grievance, vexatious or malicious, incomplete or wide-ranging, frivolous or sensitive.

The Group or AUSPAC Tier Administrator will then determine whether the report:

- is a Protected Disclosure and an investigation should occur; or
- is not a Protected Disclosure but still should be referred for investigation by the relevant business unit, for example Human Resources; or
- is not a Protected Disclosure and investigation is not required.

Decisions on what to do with a report post-assessment must be endorsed by a member of the Group Compliance or AUSPAC Financial Crime Management team.



## **Vexatious and/or malicious reports**

Employees who raise malicious, vexatious or knowingly untrue reports will face disciplinary action, which in some cases could result in suspension or dismissal from QBE employment.

QBE reserves the right not to investigate reports that it considers are malicious, vexatious or knowingly untrue.

*Further information can be found in supporting Whistleblowing processes for Australian entities.*

## **Incomplete, wide-ranging, and/or non-specific reports ('incomplete reports')**

Where incomplete reports are received, further information should be sought from the discloser (either by the Tier Administrator or the Eligible Recipient).

If incomplete reports are raised through the Hotline, the discloser is to be given two opportunities across 15 business days to provide additional information via the Hotline. The Eligible Recipient should also make two attempts across 15 business days for further information to be provided.

If no further information is received, a decision can be made not to investigate the report.

Reasons for the recommendation not to investigate must be endorsed by a member of the Group Compliance or AUSPAC Financial Crime Management team.

Where possible, the reasons not to investigate should be provided to the discloser – either through the Hotline or via the Eligible Recipient.

## **Frivolous reports**

Where reports are received that raise concerns of a frivolous nature, QBE can decide not to investigate the report.

*Further information can be found in supporting Whistleblowing processes for Australian entities.*

## **Sensitive reports**

Where reports are made that raise concerns regarding sensitivity, steps should be taken to ensure that knowledge of the report is limited and that the confidentiality (or anonymity, if requested) of the discloser is maintained.

*Further information can be found in supporting Whistleblowing processes for Australian entities.*

## **Investigation - Protected Disclosures**

Investigation of a Protected Disclosure must commence within seven business days of report receipt.

The Tier Administrator is responsible for nominating an Investigator and communicating with the Eligible Whistleblower (either through the Hotline or the Eligible Recipient).

Depending on complexity, QBE aims to manage and investigate Protected Disclosures to an appropriate conclusion and remediation to take place within 60 business days. Ongoing reasonable explanations will be provided to the Eligible Whistleblower if the investigation is ongoing past this period.

## **Investigation - other disclosures**

Where a report is not defined as a Protected Disclosure, but recommended to be investigated by another business unit, the Tier Administrator must refer the disclosure to that business unit within seven business days of report receipt.

*Further information can be found in supporting Whistleblowing processes for Australian entities.*

## **Decisions about a report**

The Tier Administrator (or the Eligible Recipient) must communicate to the discloser, either through the Hotline or via the Eligible Recipient, the decision regarding their report being:

- Protected Disclosure referred for investigation; or
- not a Protected Disclosure but still referred for investigation by another business unit; or
- not a Protected Disclosure and not to be investigated. If the report is not to be investigated, the Tier Administrator must close the report in the Hotline within ten business days with supporting reasons.

## **Communication**

Communications with an Eligible Whistleblower must occur securely and confidentially, using the Hotline if possible.

Where the Protected Disclosure is received by an Eligible Recipient, and the Eligible Whistleblower does not want the report logged in the Hotline, communications can take place between the two using agreed communication channels (secure email, telephone etc). Confidentiality must be maintained.

## **Support to the Eligible Whistleblower**

QBE will offer support to Eligible Whistleblowers while an investigation is conducted, including providing full access to QBE services, including, REACH My Best.

## 5. Policy ownership

<b>Policy reference:</b>	COMP06
<b>Policy owner:</b>	Group Chief Compliance Officer
<b>Frequency of review:</b>	Every two years, or more frequently as required
<b>Approval:</b>	Group Board Audit Committee
<b>Approval date(s):</b>	Original approval date - 20 June 2016 Updated - 1 May 2018 (to accommodate introduction of QBE's new Ethics Hotline) Updated - December 2019 to include Appendix A - Australian entities
<b>Status:</b>	Updated
<b>Point of contact:</b>	Robyn Ziino Head of Group Compliance robyn.ziino@qbe.com